REMARKS

Claims 11-20 are pending in the application. Claims 1-10 have been canceled, and new claims 11-20 have been added. Applicant reserves the right to pursue the original claims and other claims in this and other applications. In view of the amendments to the claims and the remarks below, Applicant respectfully requests that the rejections be withdrawn and the claims be allowed.

New claims 11-16 correspond to canceled claims 1-6. Claims 11 and 12 include significantly rewritten content from former claims 1 and 2, while claims 13-16 contain only minor changes from former claims 3-6. New claims 17 and 18 correspond to canceled claims 7 and 8. Claim 17 is a significantly rewritten version of former claim 7, while claim 18 is similar to former claim 8.

The new claims are allowable over U.S. Patent No. 7,171,468 to Yeung et al. ("Yeung"). Independent claim 11 recites a method for managing files in a file management system that includes a file managing apparatus for managing file transfers among a plurality of user terminals. When a file is set as open at a terminal, a unique ID is assigned to identify the file. The unique ID and a sub-ID (the sub-ID indicating a past delivery action) are stored. If, after a file is stored in the file transfer action database, a transfer is performed between two user terminals, the file management apparatus stores and manages a combination of a sub-ID of a transmitting terminal and a sub-ID of a receiving terminal in the transfer actions database.

In rejecting former claims 1-10, the Office Action notes that "nothing in the claims indicate that [the system] is a peer-to-peer system, precludes a central repository or uses a central system that only contains tracking data" and that the previous claims could be read as tracking movement to different locations on a single computer. Office Action at 3-4. The new claims include limitations that address these issues. Independent claim 11 refers to the transfer of a file "performed at least between two user terminals." The amendments also clarify that the "file transfer database" merely stores a combination of the unique ID and a sub-ID, and that the files

7

themselves exist on and are transferred between "user terminals." Since Yeung does not teach or suggest tracking the transfer of files "between two user terminals," it does not anticipate claim 11.

Moreover, Yeung's "file name" does not meet the "unique ID" of claim 11. Claims must be given their broadest reasonable interpretation consistent with the specification. In this case, the specification explicitly states that a file name is not a unique ID:

> The unique ID is the ID that can identify the data file throughout its lifecycle. A file name which is commonly used to identify a file is generally the name that the creator of the data file arbitrarily has assigned to the file. However, using only the file name to identify a particular file cannot eliminate the possibility of the file name being identical to another file name assigned by another work participant and the possibility of the file name being changed by a work participant as the data file is transferred from one terminal to another in a chain. If the file name is changed, the history of the file before that time becomes untraceable. As a countermeasure to prevent these occurrences, **the system of the present embodiment uses the unique file ID to identify a particular file instead of the file name** so that the data file label will not change while the file is passed on among a plurality of work participants.
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> Application Specification at [0034] (emphasis added).

In view of this language, it is clear that the unique ID cannot be reasonably interpreted as a file name. The file name would, in fact, not necessarily be unique as between the "two user terminals" recited in the claim. Thus, Yeung's "file name" does not teach the unique ID of claim 11.

For at least these reasons, claim 11 is allowable over the prior art of record. Claims 12, 13 and 16 depend from claim 11 and are allowable for at least the same reasons that claim 11 is allowable. Claim 14 depends from claim 13 and is allowable for at least the same reasons that claim 13 is allowable.

Claim 17 recites "file transfer actions among [a] plurality of user terminals" and "a file transfer actions database" that stores management information including a unique ID. As

discussed above in reference to claim 11, the prior art of record does not teach these elements. Thus, claim 17 is allowable for similar reasons that claim 11 is allowable, and for other reasons. Claim 18 depends from claim 17 and is allowable for at least the same reasons that claim 17 is allowable. Claims 19 and 20 depend from claim 18 and are allowable for at least the same reasons that claim 18 is allowable.

In view of the above amendments and remarks, applicant believes the pending application is in condition for allowance.

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